

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES

v.

11-CR-06

BRIAN MAHONEY

DEFENDANT'S WITNESS AND EXHIBIT LISTS

Counsel for defendant Brian Mahoney state that any or all of the following witnesses may be called at trial:

1. David Mahoney of Charlestown, MA
2. Diane Mahoney of Charlestown, MA
3. Kelley Paquette of Charlestown, MA
4. Patricia Mahoney of Charlestown, MA
5. Dover (N.H.) Police Officer James M. Yerardi
6. Attorney Nelson Lovins, Esq. who practices in Woburn, MA
7. Kimberley Delisle of Dover, NH
8. N.H. Police Sergeant Cheyl Nedeau, or keeper of the records for the N.H. State Police Sex Offender Registry.

Mr. Mahoney reserves the right to call any witness on the government's witness list. He reserves the right to testify. Additionally, he reserves the right to call witnesses who are not on this list as rebuttal witnesses in the event he is surprised by the government's proof.

Counsel for defendant Brian Mahoney state that the following exhibits may be introduced at trial:

1. Any and all State of New Hampshire Sex Offender Registry forms signed by defendant Brian Mahoney, along with the associated paperwork for each form maintained by the State Police Sex Offender Registry keeper of the records.

NOTE: At the time of this filing, there are several pending motions relating to the status of counsel and to Mr. Mahoney's request to represent himself *pro se*. Because undersigned counsel remain counsel of record, they have an obligation to file a good faith witness and exhibit lists at this time.

Respectfully submitted,

May 30, 2012

/s/ Andrew R. Schuman,
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/s/ Paul J. Garrity,
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CERTIFICATE OF SERVICE

I, Andrew R. Schulman, hereby certify that I have mailed a copy of this motion to all counsel of record on May 30, 2012 via the Court's ECF facilities.

/s/Andrew R. Schulman,
Andrew R. Schulman